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REPLY TO: ,

Cranford

December 8, 1992

Superfund Records Center
SITE: SRS
BREAK: 11.9
OTHER: _____

Marilyn K. Goldberg
United States Environmental
Protection Agency
P. O. Box 221470
Chantilly, Virginia 22022



SEMS DocID

588956

Re: Congoleum Corporation -- Solvents Recovery
Service of New England, Southington,
Connecticut
Our File No.: 4450

Dear Ms. Goldberg:

We are attorneys for Congoleum Corporation. Merrill S. Hohman's letter of November 13, 1992 concerning Notice of Potential Liability at the Solvents Recovery Service of New England Site in Southington, Connecticut has been referred to us for response and future handling.

Please direct all future correspondence to Congoleum Corporation to:

Russell L. Hewit, Esq.
Dughi and Hewit, P.C.
340 North Avenue
Cranford, New Jersey 07016

Telephone No.: (908) 272-0200
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Without prejudice to any and all rights, claims and defenses of Congoleum Corporation, including but not limited to non-delivery of Congoleum Corporation wastes to the Site, Congoleum Corporation will cooperate with the USEPA through the PRP Steering Committee.

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At the outset, we note that Congoleum Corporation has searched its records and has found no evidence of any relationship or transaction with the Site. The Transactional Documentation Summary for Congoleum Corporation identifies a single 5,000 gallon transaction on March 25, 1982 as documented in a Connecticut DEP Monthly Report, Bates Stamp No. 4000137. Will you kindly forward a copy of that document for our files. In addition, if there is any other information supporting the allegation that Congoleum Corporation's wastes are present at the Site or were otherwise disposed there, kindly provide such information.

By carbon copy of this letter, we are notifying Robert C. Kirsch of our representation of Congoleum Corporation and participation in the PRP Steering Committee.

This letter is written without prejudice to Congoleum Corporation.

Sincerely yours,

DUGHI AND HEWIT

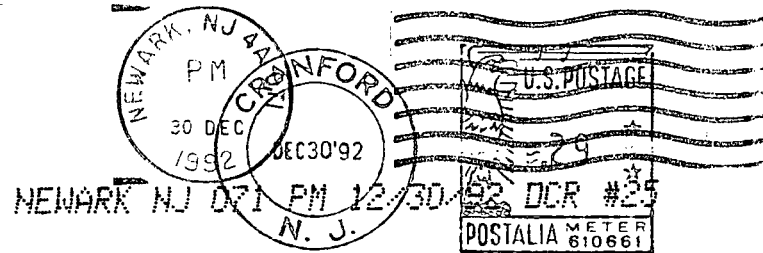


Russell L. Hewit

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cc: Robert C. Kirsch, Esq.

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